

MEMO ENDORSED

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Honorable Andrew L. Carter, Jr.
District Court Judge
US Courthouse, S.D.N.Y.
40 Foley Square
New York, NY 10007

December 16, 2020

Re: United States v. Johnson, et al. (**Keith McClean**)
Ind. No. 19 Cr. 828(ALC)

Dear Judge Carter:

I represent, Keith McClean, in the above matter. When he was arraigned on the indictment he was not eligible for bail because he was serving a state sentence for an unrelated crime. As a consequence his bail application was reserved without prejudice. Mr. McClean is now eligible for bail because he has completed his state sentence which I understand will result in the lifting of a detainer by state authorities.

Mr. McClean now proposes the following bail-package subject to the Court's approval and with the Government's consent:

- 1) A \$100,000 personal recognizance bond
- 2) Co-signed by three financially-responsible people.
- 3) Electronic bracelet
- 4) seek employment
- 5) Surrender travel documents and no new applications
- 6) Drug testing and treatment as directed by Pre-Trial
- 7) No contact with co-defendants outside the presence of counsel
- 8) Pre-Trial supervision as directed.

If the Court approve this bail package, hopefully, Mr. McClean will spend the holidays with his family. Thank you for your consideration.

APH: fms
cc: AUSA Mollie Bracewell and Ryan Finkle
AUSA Ryan Finkle

Respectfully,

s/s
Allan P. Haber, Esq.

The application is GRANTED.
So Ordered.

Andrew L. Carter 12/24/20